

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**CHIARA MEATTELLI,**

Petitioner,

CASE NO.

v.

**GOOGLE LLC d/b/a YOUTUBE**

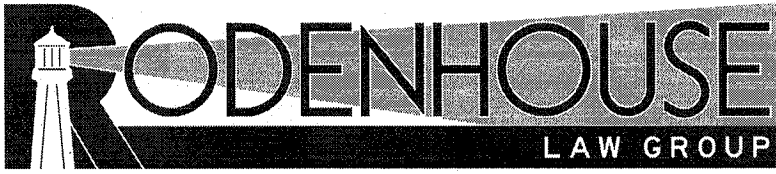
Respondent.

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C. Christopher Newberg (P79025)  
RODENHOUSE LAW GROUP P.C.  
Attorney for Petitioner  
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Grand Rapids, MI 49504  
(616) 451-4000  
chris@rodenhouselaw.com

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**EXHIBIT 2**



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June 29, 2020

Google LLC d/b/a YouTube  
c/o CSC-Lawyers Incorporating Service  
(Company)  
601 Abbot Road  
East Lansing, MI 48823  
Email: [legal@support.youtube.com](mailto:legal@support.youtube.com)

***Re: DMCA Takedown Notice***

To Whom It May Concern,

I am contacting you on behalf of Chiara Meattelli, a photojournalist represented by Rodenhouse Law Group PC. This is a notice under the Digital Millennium Copyright Act of 1998 ("DMCA"), 17 USC § 512. I am the duly authorized representative of the copyright owner of the work identified below. I am writing to report an instance of copyright infringement on a website hosted by you and for which you are the service provider.

The infringing content, which can be found in the ChiarAss MeattelLicker channel page and uploaded videos, contain copyrighted photographs, videos, and/or other content owned by Ms. Meattelli. Titles and URLs addresses associated with the infringing content are provided below, as are other details involving the infringement of Ms. Meattelli's intellectual property rights. Ms. Meattelli demands that you immediately remove and disable access to the infringing content accessible through your website or service, in accordance with the DMCA.

***Infringing Video 1***

Title of Infringing Video: ChiarAss MeattelLicker - The Trump O Mouth

Video URL: <https://www.youtube.com/watch?v=rwFXgEVt2yk>

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli with a friend from Ms. Meattelli's Facebook account.

*Location in Infringing Video:* 00:32

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=86008775612&set=t.560532213&type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Instagram

*Location in Infringing Video:* 0:51

*Link to Original Photograph:*

<https://www.instagram.com/p/Bdpf1OXBE3m/?igshid=1vb9ho5i3s1ei>

### ***Infringing Video 2***

Title of Infringing Video: ChiarAss MeattelliLicker - L'ossessione per l'ossessione

Video URL: <https://www.youtube.com/watch?v=R7z4V10tg6g>

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:01

*Link to Original Photograph:*

<https://www.instagram.com/p/BE3v8ewGSOWhM0WYt3Tmb5ISND05HdNslfuJKs0/?igshid=1w78g08gtduo9>

*Description:* Video of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:03

*Link to Original Photograph:*

[https://www.facebook.com/chiara.meattelli/videos/vb.560532213/10155938688867214/?type=2&video\\_source=user\\_video\\_tab](https://www.facebook.com/chiara.meattelli/videos/vb.560532213/10155938688867214/?type=2&video_source=user_video_tab)

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:07 – 0:08

*Link to Original Photograph:*

<https://www.instagram.com/p/BxTGpJRn4eYGwWp12btSTEEV2hdmLj31jQz5AM0/>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:15

*Link to Original Photograph:*

<https://www.instagram.com/p/BsUA22PhYeC5WzOHuayKr8PRPVkkHGcgAOOTYM0/>

*Description:* Photograph taken by Ms. Meattelli and posted to Facebook

*Location in Infringing Video:* 0:22 – 0:36

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=86008775612&set=t.560532213&type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:38

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=10154946611197214&set=t.560532213&type=3&theater>

### ***Infringing Video 3***

Title of Infringing Video: ChiarAss MeattelliLicker & Nino Tancelo – ChiarAss

Video URL: <https://www.youtube.com/watch?v=5rDVNzYepYo>

Work(s) Infringed:

*Description:* "Disco Sofa" music video directed by Ms. Meattelli

*Location in Infringing Video:* Throughout.

*Link to Original Video:* <https://www.youtube.com/watch?v=Y-liQMAutp8>

#### ***Infringing Video 4***

Title of Infringing Video: ChiarAss MeattelLicker Show

Video URL: <https://www.youtube.com/watch?v=Vc3uGN9CsV8>

Work(s) Infringed:

*Description:* Video interview by Ms. Meattelli featuring Dakota Johnson and Cailee Spaeny.

*Location in Infringing Video:* Throughout.

*Link to Original Video:* <https://www.youtube.com/watch?v=CD4U2731PzU&t=118s>

#### ***Infringing Video 5***

Title of Infringing Video: ChiarAss MeattelLicker - My name is ChiarAss MeattelLicker

Video URL: [https://www.youtube.com/watch?v=5T\\_H8d0QYrQ](https://www.youtube.com/watch?v=5T_H8d0QYrQ)

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 1:20

*Link to Original Photograph:*

[https://www.instagram.com/p/BojrekDBwhXEjOGoxs5jOpJ\\_CPBvebtUrx7WU0/](https://www.instagram.com/p/BojrekDBwhXEjOGoxs5jOpJ_CPBvebtUrx7WU0/)

#### ***Infringing Video 6***

Title of Infringing Video: ChiarAss MeattelLicker - The Witch

Video URL: <https://www.youtube.com/watch?v=xNHgh1ALYpU>

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:01

*Link to Original Photograph:* <https://www.instagram.com/p/BopSZvpBpEpkmecjT1uJXpxGIr-7xYGnxAe5tY0/>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:16

*Link to Original Photograph:* <https://www.instagram.com/p/BZa4h5wljTXnLr-0Csbelq4zTE1gbfdKrH3XG40/>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:19

*Link to Original Photograph:*

<https://www.instagram.com/p/BjyrZX2Aztr1efqImKsbqQ6NpNodHbWBco9sE80/>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:32

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=10152465409670549&set=t.560532213&type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:45

*Link to Original Photograph:* [https://www.instagram.com/p/Bn7O28-hpCU2pLugqNqZu7xui0\\_MTQPp1eHW2E0/](https://www.instagram.com/p/Bn7O28-hpCU2pLugqNqZu7xui0_MTQPp1eHW2E0/)

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:48

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=10155689705210549&set=t.752265548&type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 1:08

*Link to Original Photograph:*

[https://www.instagram.com/p/Bmo4MjFAR8n9mz8K67sZXzE\\_ussGUDZqt8Jsbg0/](https://www.instagram.com/p/Bmo4MjFAR8n9mz8K67sZXzE_ussGUDZqt8Jsbg0/)

### ***Infringing Video 7***

Title of Infringing Video: ChiarAss MeattelLicker - Surfing with the Trumps

Video URL: <https://www.youtube.com/watch?v=ZQBfQTiNKio>

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:01

*Link to Original Photograph:* [https://www.instagram.com/p/BoAp\\_jPh-hiJLH55kLD3UZq4AgAp18qdQuwfjs0/](https://www.instagram.com/p/BoAp_jPh-hiJLH55kLD3UZq4AgAp18qdQuwfjs0/)

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 1:13

*Link to Original Photograph:* [https://www.instagram.com/p/BiSYNNanRh4dP-rRRUPg8zPHAG2EL86jbg\\_aQI0/](https://www.instagram.com/p/BiSYNNanRh4dP-rRRUPg8zPHAG2EL86jbg_aQI0/)

### ***Infringing Video 8***

Title of Infringing Video: ChiarAss MeattelLicker - Il giorno prima

Video URL: <https://www.youtube.com/watch?v=vTTIj9Xbqyo>

Work(s) Infringed:

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:05

*Link to Original Photograph:* [https://www.instagram.com/p/BZuSRl4F-g\\_MVLKrTlMp6DJtyRzleUqXKV1J4c0/](https://www.instagram.com/p/BZuSRl4F-g_MVLKrTlMp6DJtyRzleUqXKV1J4c0/)

*Description:* Photograph taken by Ms. Meattelli and posted to Facebook

*Location in Infringing Video:* 1:39

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=86008775612&set=t.560532213&type=3&theater>

### ***Infringing Video 9***

*Title of Infringing Video:* ChiarAss MeattelLicker – Surreale

*Video URL:* [https://www.youtube.com/watch?v=\\_16KhGvXJpI](https://www.youtube.com/watch?v=_16KhGvXJpI)

*Work(s) Infringed:*

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Instagram account

*Location in Infringing Video:* 0:01

*Link to Original Photograph:* <https://www.instagram.com/p/BPRIaqRj209y9WvBnzpC8-H9LtF06l6KKpnfaY0/>

### ***Infringing Video 10***

*Title of Infringing Video:* ChiarAss MeattelLicker - Witchery

*Video URL:* <https://www.youtube.com/watch?v=ecJXS2ylLdY>

*Work(s) Infringed:*

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:01

*Link to Original Photograph:*

<https://www.facebook.com/yumikomusic/photos/t.560532213/180419701947/?type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:06

*Link to Original Photograph:*

<https://www.facebook.com/yumikomusic/photos/t.560532213/180414571947/?type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:11

*Link to Original Photograph:*

<https://www.facebook.com/photo.php?fbid=10150596883277214&set=pb.560532213.-2207520000..&type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:39

*Link to Original Photograph:*

<https://www.facebook.com/yumikomusic/photos/a.180409816947/180414571947/?type=3&theater>

*Description:* Photograph of Ms. Meattelli taken from Ms. Meattelli's Facebook account

*Location in Infringing Video:* 0:44

*Link to Original Photograph:*

<https://www.facebook.com/yumikomusic/photos/a.180409816947/180424526947/?type=3&theater>

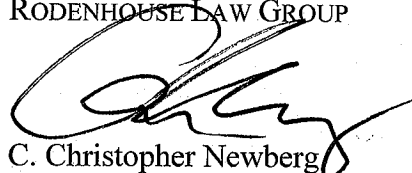
I, C. Christopher Newberg, have a good-faith belief that use of the materials described above in the manner complained of is not authorized by the copyright owner, its agent, or the law. I declare under penalty of perjury that the information in this notification is accurate and that I am the owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

This correspondence does not constitute a waiver of any right to recover damages incurred by virtue of any such unauthorized activities, and such rights, as well as claims for other relief, are expressly retained.

If you have any questions or concerns, please feel free to contact me via email at [chris@rodenhouselaw.com](mailto:chris@rodenhouselaw.com), phone at 616-451-4000, or mail at the address in the heading above.

Very truly yours,

RODENHOUSE LAW GROUP



C. Christopher Newberg  
Attorney for Chiara Meattelli